

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE, WESTERN DIVISION

A.S., by her next friend and mother,
JANIELE REID, and **JANIELE REID**,
individually,

Plaintiffs,

Case No: 2-19-cv-02056-JTF-cgc

v.

JURY DEMANDED

**SHELBY COUNTY BOARD OF
EDUCATION**, and **GREG M^cCUL-
LOUGH**, in his individual and official
capacities,

Defendants.

DEFENDANTS' REVISED RULE 26 DISCLOSURES

Come now the Defendants, Shelby County Board of Education and Greg M^cCullough (hereinafter "Defendants"), by and through their attorneys of record, Cheryl Ramage Estes and Lewis Thomason, and hereby submit the following Revised Disclosures pursuant to *Rule 26(a)(1), Federal Rules of Civil Procedure*:

1. The name and, if known, the address and telephone of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

The following witnesses are employees of Defendant, Shelby County Board of Education, and may be contacted through counsel. Cumulative, these teachers, therapists, and administrative personnel will testify as to all academic records of the minor Plaintiff, notes, memos, and summaries pertaining thereto, all records concerning any Individualized Educational

Plans (or the predecessor thereof) developed to assist the minor Plaintiff, as well as information pertaining to services provided:

NAME	SUMMARY OF TESTIMONY
ARCHER, A.	The witness will provide testimony concerning accommodations made, accommodations followed, and compliance with all aspects of IEP recommendations
BAINER, Laurie	The witness will provide testimony concerning accommodations made, accommodations followed, and compliance with all aspects of IEP recommendations
BAUTISTA, Divina	The witness will provide testimony concerning accommodations made, accommodations followed, and compliance with all aspects of IEP recommendations
CURRIE, E.	The witness will provide testimony concerning accommodations made, accommodations followed, and compliance with all aspects of IEP recommendations
DuBOIS, A.	This witness will testify concerning compliance with all required accommodations, as well as all aspects of compliance with IEP recommendations
FIK, Rebecca	The witness will provide testimony concerning accommodations made, accommodations followed, and compliance with all aspects of IEP recommendations
GAMMEL, Bobby	This witness is familiar with A.S., through middle school. Testimony will be provided concerning accommodations granted by the school
HARDY, K.	The witness will provide testimony concerning accommodations made, accommodations followed, and compliance with all aspects of IEP recommendations
HARDY, Taurin	The witness will provide testimony concerning accommodations made, accommodations followed, and compliance with all aspects of IEP recommendations
HILL, N.	The witness will provide testimony concerning accommodations made, accommodations followed, and compliance with all aspects of IEP recommendations
HOWARD, Gregory	This witness will testify as to the accommodations made and compliance with the care and education of A.S.
M ^c CULLOUGH, Greg	This witness will testify as to full compliance with all aspects of care for A.S., including accommodations and compliance with IEP, confirmation that all safety and care concerns were addressed fully and in a timely manner, and specific and new accommodations made for A.S. due to very temporary circumstances beyond the control of any party or entity involved

SEAY, Kichelle	The witness will provide testimony concerning accommodations made, accommodations followed, and compliance with all aspects of IEP recommendations
SHAW, Kimberly	This witness will testify as to all accommodations made for A.S., as well as full compliance with IEP requirements
STALLSMITH, Jamie	This witness will testify as to all accommodations made for A.S., as well as full compliance with IEP requirements
WALTON, M.	The witness will provide testimony concerning accommodations made, accommodations followed, and compliance with all aspects of IEP recommendations
WHITMORE, Katherine	The witness will provide testimony concerning accommodations made, accommodations followed, and compliance with all aspects of IEP recommendations
WILLIAMS, K.	The witness will provide testimony concerning accommodations made, accommodations followed, and compliance with all aspects of IEP recommendations

All the above listed witnesses may be contacted through Defendants' counsel. In addition, these Defendants incorporate any witnesses listed by the Plaintiff. Defendants will also designate a representative at the appropriate time.

These Defendants specifically reserve the right to amend and modify this list in the event that additional witnesses become known to them; and, further, as additional witnesses become involved going forward. List of teachers varies each academic year, so supplementation of this list will be required.

2. A copy of, or a description by category and location, all documents, data compilations, and tangible things that are in the possession, custody or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

A. Bates-stamped documents #1-00001 through #1-00815.

Academic and IEP records, notes, and information pertaining to the minor Plaintiff.

- B. Bates-stamped documents #2-00001 through #2-00834.
Academic and IEP records, notes, and information pertaining to the minor Plaintiff.
- C. Bates-stamped documents #3-00001 through #3-00848;
Academic and IEP records, notes, and information pertaining to the minor Plaintiff.
- D. Bates-stamped documents #4-00001 through #4-01996;
Academic and IEP records, notes, and information pertaining to the minor Plaintiff.
- E. Defendants also have numerous medical records sent to Defendants by Plaintiff Reid:

LeBonheur Children's Medical Center, 08/30-09/02, 2015;

LeBonheur Children's Medical Center records, 11/05-11/07, 2015;

LeBonheur Children's Medical Center records, 11/15/2015;

LeBonheur Children's Medical Center records, 11/29/2015;

LeBonheur Children's Medical Center records, 12/07/2015;

LeBonheur Children's Medical Center records, 12/28/2015;

LeBonheur Children's Medical Center records, 01/12/2016;

LeBonheur Neurology records 02/23/2015 and 11/05-11/07/2015;

UT-LeBonheur Pediatric Specialists records;

Eye Center medical records.

Flash drive of pictures.

3. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under *Rule 34* the documents or other evidentiary material, not privileged or protected from disclosure on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

None.

4. For inspection and copying as under *Rule 34* any insurance agreement under which any person carrying on an insurance business able to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

None.

5. **Disclosure of Expert Testimony.**

Defendants have made no decision as to expert testimony at this time. Defendants will update these Disclosures when such decisions have been made.

Respectfully submitted,

LEWIS THOMASON

s/Cheryl Ramage Estes

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that the foregoing electronically filed document was served upon all counsel of record via the Court's CM/ECF filing system on today's date.

s/Cheryl Ramage Estes
Cheryl Ramage Estes

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